

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION**

**JOHN DOE,
Plaintiff,**

v.

**THE SAVANNAH COLLEGE OF
ART AND DESIGN, INC.
Defendant.**

Case No. _____

**PLAINTIFF’S MOTION TO SEAL EVIDENCE SUPPORTING ITS
RESPONSE TO DEFENDANT’S MOTION FOR SUMMARY JUDGMENT**

COME NOW Plaintiffs respectfully move the Court pursuant to Rule 5.2 of the Federal Rules of Civil Procedure to file the following evidence supporting its Response to Defendant’s Motion for Summary Judgment under seal:

- The Declaration of John Doe;
- Hearing Officer Decision; and
- Sanctioning Officer Decision.

Good cause exists to file these documents under seal. This Title IX civil action involves sexual assault/rape allegations that are in dispute. The Declaration of John Doe, as well as the decisions of both the hearing officer and sanctioning officer, include the name of both the plaintiff-respondent and the complainant in the underlying matter. Additionally, since release of the complainant and respondent’s

names in any response documents would be violations of Title IX and FERPA, it logically follows that the case should be initiated to protect the identity and education records of the students in this matter.

The Complainant has not consented to her name being in the public record, and without access to the investigative file or records Plaintiff cannot possibly know of any requests for anonymity by Complainant or any agreements for non-disclosure of Complainant's identity should a matter such as this arise. For the reasons listed above, especially when coupled with the fact that all matters to date in this action have not been a matter of public record, it is appropriate to initiate this case under a pseudonym and file these items under seal.

In light of the disputed findings against John Doe and the sensitive nature of the underlying matter, Plaintiffs respectfully request permission to file the Declaration of John Doe, the Hearing Officer and Sanctioning Officer under seal.

Respectfully submitted this 5th day of January, 2023.

/s/ Joseph J. Steffen, Jr.
Joseph J. Steffen, Jr.
Georgia Bar No. 677766
223 W. York, Savannah, GA 31401
(912) 604-4147 | joe@joesteffen.com
Counsel for Plaintiff